
EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

THE TRUSTEES OF PURDUE UNIVERSITY,

Plaintiff,

vs.

STMICROELECTRONICS N.V.,
STMICROELECTRONICS INTERNATIONAL N.V.,
AND STMICROELECTRONICS, INC.

Defendants.

CASE NO. 6:21–CV–727-ADA

JURY TRIAL DEMANDED

DEFENDANTS' PROPOSED CLAIM TERMS FOR CONSTRUCTION

In accordance with the Court's Scheduling Order [ECF 45], Defendants STMicronics, Inc. and STMicronics N.V.¹ (referred to collectively herein as "the ST Defendants") serve this Identification of Proposed Claim Terms for Construction.

'633 Patent

Term	Claim
The preamble is limiting	9
"less than about three micrometers"	9

'112 Patent

Term	Claims
"a second, thicker oxide layer" / "a gate oxide layer"	1, 6

¹ STMicronics N.V. is not subject to the Court's jurisdiction, as detailed in its Motion to Dismiss [ECF 38]. And STMicronics International N.V. has not yet been served in this case and therefore is not properly before the Court and not subject to the Court's jurisdiction.

Dated: January 18, 2022

Respectfully submitted:

By: /s/ Justin S. Cohen

Bruce S. Sostek

SBN 18855700

Bruce.Sostek@hklaw.com

Richard L. Wynne, Jr.

SBN 24003214

Richard.Wynne@hklaw.com

Justin S. Cohen

SBN 24078356

Justin.Cohen@hklaw.com

Nadia E. Haghighatian

SBN 24087652

Nadia.Haghighatian@hklaw.com

HOLLAND & KNIGHT LLP

One Arts Plaza

1722 Routh St., Suite 1500

Dallas, Texas 75201

214.969.1700

Max Ciccarelli

SBN 00787242

max@ciccarellilawfirm.com

CICCARELLI LAW FIRM

100 N. 6th Street, Suite 502

Waco, Texas 76701

214.444.8869

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that on January 18, 2022, the foregoing document was served via electronic mail on counsel of record for Plaintiff.

/s/ Justin S. Cohen
Justin S. Cohen